

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

YISEL DEAN, Administratrix of the Estate of )  
STEVEN DEAN, deceased, et al., )

Plaintiff,

VS.

RAYTHEON COMPANY, et al.,

Defendants.

Case No.: 05 CV 10155 PBS

**CONSENT MOTION FOR AN EXTENSION OF TIME TO FILE JOINT STIPULATION**  
**OF FACTS**

Plaintiff herein moves for an extension of time in which to file a Joint Stipulation of Facts in this case relative to Colgan's Motion to Dismiss. Plaintiff has recently received new documents pertaining to Steven Dean's employment with Colgan Air from counsel for Defendant Colgan Air and due to illness, plaintiff's counsel has not had the opportunity to review these documents. Defendant Colgan Air is also still searching for some documents.

Plaintiffs counsel has conferred with counsel for Defendant Colgan Air, Inc. and he has agreed to an extension of five days to file the Joint Stipulation.

WHEREFORE, Plaintiff respectfully requests that the court enter an Order fixing October 12, 2005, as the date to file these materials.

October 6, 2005

Respectfully Submitted,

/s/ Robert McConnell  
Robert McConnell (BBO No. 550625)  
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